Title IV Reporting Requirements

> *By the end of this session, you will be able to:*
>
> - *identify the major reporting requirements and reporting deadlines for Title IV programs.*

INTRODUCTION

This session describes the basic reporting requirements for schools participating in the Title IV programs.

We will discuss the reporting deadlines for each of the program reports.

This session will also cover the major features and important details of some of the reports.

To thoroughly understand reporting requirements, however, you also should read other sources of information, such as the Handbook and *The Blue Book*, as well as the letters and instructions that come with ED reports.
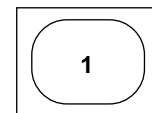
PW 1

OVERVIEW OF REPORTING REQUIREMENTS

Please turn to the "Reporting Requirements" chart on page 3 of your Workbook. (OH 1) [IG, pg. 16]

PW 3

1

Eleven types of reports associated with Title IV schools are listed in the first column.

One set of reports not discussed here involves reporting changes to Federal Pell Grant Payment Data.

Instructor's Notes

■ Schools are required to transmit Pell payment information using the *Pell Payment for Windows* software or an equivalent product. We will discuss this in detail in Session 21.

For schools that participate in the Pell Grant Program, the **Student Payment Summary (SPS)** is sent to schools by ED at least three times during the award year, as well as at the end of each award year.

SPS

■ Information contained in the SPS enables schools to compare their records to ED's records for each Pell recipient.

Schools must now request funds using the new Grant Administration and Payment System (GAPS). While we will review the basics of the system, details on how schools will report expenditures are still being developed.

GAPS

Every September, schools that participate in campus-based programs must complete and submit a **Fiscal Operations Report and Application to Participate** or **FISAP.** This report is due by October 1 each year.

FISAP

Schools that use the Federal Perkins Loan Program IRS/ED Skip-Tracing Service to help them with due diligence requirements must submit the **Federal Perkins Safeguard Activity Report** once a year, at the end of August.

Federal Perkins Safeguard Activity Report

Schools that participate in the Direct Loan Program or the FFEL Program are sent an electronic **Student Status Confirmation Report (SSCR)** at regular intervals.

■ Once you receive the report, you must reconcile any discrepancies in student information. The report must be sent back to the National Student Loan Data System (NSLDS) within 30 days.

✓ DCL GEN-96-17
September 1996

Loan Reconciliation must be done by schools participating in the Direct Loan Program.

Loan Reconciliation

■ Each month, the school receives a Direct Loan School Account Statement (DLSAS) from ED via the Title IV Wide Area Network.

■ A school must check with this statement and make sure the amounts listed match their own records.

Finally, schools must prepare **annual financial and compliance audit reports** for the **Federal Pell Grant Program**, **campus-based programs**, **Federal Direct Loan Program,** and **Federal Family Education Loan Program**. These are generally referred to as nonfederal SFA audits.

**Annual Audits
(Nonfederal)**

■ The financial audit is made up of the institution's basic audited financial statements.

■ The institution's compliance audit covers all transactions for the Title IV programs administered by the school.

We'll be talking about audits in more detail when we get to Session 11.

Finally, schools must complete reports involving crime on campus, completion rates of students, and gender equity in terms of the school's employees. These reports are not ties to specific programs, but to the school as a whole.

	Instructor's Notes

REPORTING DEADLINES

Please turn to the "Reporting Deadlines" chart on page 4 of your Workbook. [IG, pg. 17]

PW 4

As you can see, this chart is in the form of a calendar showing the deadlines for submitting reports.

The chart is designed so you can easily look up submission deadlines.

Also, Appendix E in your Workbook contains a financial aid calendar that lists reporting deadlines for each month. Are there any questions about these deadlines?

Now we'll discuss the major reports in greater detail.
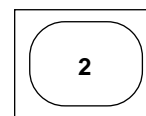
GAPS

Previously, schools requested funds and reported on expenditures using the ED/PMS 272 report. This report, though, has been replaced. Schools must now request Pell, campus-based, and Direct Loan funds over the Internet using the Grant Administration and Payment System (GAPS). Schools must have several identifiers to participate, including (OH2):

2

- ■ a Data Universal Numbering System (DUNS) Number,

- ■ a User ID, and

- ■ a password.

Note to Instructor:
For 1998-99, schools still have the option of requesting funds by phone by calling 800-654-8341. However, they will still need a DUNS number, a User ID, and a password.
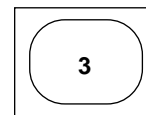
You can order a DUNS number by calling 1-800-333-0505.

ED will issue GAPS User IDs and passwords to individuals authorized to use GAPS at each school. Each individual user at a school must have his or her own ID and password.

Once schools are in the system, they request funds by Grant Award Number, which is an 11-character code that identifies, among other things, the program from which funds are being requested, like Pell or Perkins. (OH 3)

3

Instructor's Notes

More details on requesting funds is found in the *Payee's Guide for the Grant Administration and Payment System*. You can obtain this guide by downloading it from the GAPS web site at GAPSWEB.ed.gov/training, which is on page 5 of your Workbook. This web site also allows you to practice using GAPS.

We have offered you a very brief look at this new system. You can get more information, and address questions, by: (OH 4)

4   *PW 5*

- contacting your account representative;

- calling the GAPS hotline at 888-336-8930;

- sending an e-mail to: GAPS_Payments@ed.gov; or

- accessing ED's web page at www.ed.gov/offices/ OCFO/.

FISCAL OPERATIONS REPORT AND APPLICATION TO PARTICIPATE (FISAP)

The Fiscal Operations Report and Application to Participate (FISAP) is: (OH 5)

5

- an application to receive funds from one or more Title IV campus-based programs for the upcoming award year and

- an annual report of financial and enrollment activity for the previous award year.

Schools applying for campus-based funds for the first time won't have Title IV program expenditures to report from the previous award year; however, these schools must still complete and file Part I, including the certifications, and Part II of the FISAP to request funds for the upcoming award year.
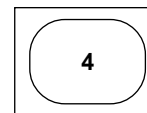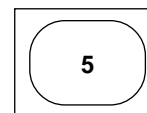
Instructor's Notes

The FISAP is an electronic report that ED mails to schools by August 1, along with detailed instructions on how to complete each line item.

■ These instructions are also explained in *The Blue Book*.

■ Schools are required to return the FISAP and accompanying certifications to ED by October 1 each year.

Along with their electronic FISAP, schools must submit a signed certification form about debarment, suspension, and other matters that requires several signatures of senior school administrators.

■ This single certification form also covers drug-free workplace and anti-lobbying requirements.

Completing the FISAP requires accurate, detailed accounting information.

■ This process can be greatly simplified if you design your chart of accounts and student master records with the FISAP in mind.

■ Chapter **6** of *The Blue Book* explains, step-by-step, how to use information from your accounts in completing the FISAP and includes a sample FISAP.

The Six Parts of the FISAP

Parts I and II of the FISAP are the application portions of the report.

Parts III through VI are the Fiscal Operations Report, with a section for each campus-based program and an overall summary of the programs.

■ When you receive the FISAP, you must carefully read the instructions that are mailed along with it.

■ The FISAP is now completed electronically via the Title IV Wide Area Network (TIV WAN).

A draft copy of the 1999-2000 FISAP is in your Workbook beginning on page 6. Follow along as we discuss each section. [IG, pg. 18-28]

PW 6-16

Part 1 - Identifying Information, Certifications, and Warning [IG, pg. 18]

PW 6

Section A—Identifying Information gathers information about the school that ED uses to update its campus-based records. It also includes a question about a school's additional locations.

Section B—Certifications and Warning includes an area for required signatures. If the school uses a financial aid consultant who signs for the FAA or fiscal officer, his or her firm's name, address, telephone number, and fax number must also be provided.

Part I, because it contains original signatures, must be returned in paper form when transmitting the rest of the FISAP electronically. Return the original instead of a photocopy.

Part II—Application to Participate [IG, pg. 19-20]

PW 7-8

Section A—Request for Funds for the 1999-2000 Award Year includes amounts requested for funding levels. If a school enters $0 for a program, it will not receive an allocation, even if it is eligible to do so. The actual allocated amounts will be computed by ED; these might differ from a school's requested amount.

Section B—FWS and/or FSEOG Institutional Share Waiver Request is used for requesting a waiver of the institutional share requirement for the FWS and FSEOG Programs if the school qualifies to do so under Title III.

Instructor's Notes

Sections C—1999-2000 Federal Perkins Loan Program-Expanded Lending Option (ELO) Participation Request allows certain schools to offer students Perkins loans at higher maximum amounts.

Section D—Federal Perkins Loan Program Liquidation Request is for schools wishing to end their Perkins participation.

Section E—Waiver Request for the Underuse of Funds allows schools a chance to justify their lack of use of funds so they won't be penalized in the upcoming award year.

Section F—Information on Enrollment provides space for traditional and nontraditional schools to report the enrollment data ED needs to compute the institution's campus-based allocations.

Section G—Assessments and Expenditures is used by ED to compute a school's need for FSEOG, FWS, and Perkins Loan funds.

Section H—Information on Eligible Aid Applicants for Award Year 1996-97 provides ED with demographic information on the school's population. ED uses this data to determine allocations for campus-based programs.

Parts III through VI summarize fiscal operations information for each of the three campus-based programs for the previous award year.

Part III—Federal Perkins Loan Fiscal Operations Report [IG, pg. 21-23]

PW 9-11

In Part III, the school is required to:

■ provide cumulative loan activity for as long as the school has been in the program,

■ provide a summary of the most recent award year, and

■ calculate the school's Perkins Loan cohort default rate.

	Instructor's Notes

Part IV—Federal Supplemental Educational Opportunity Grant Fiscal Operations Report [IG, pg. 24]

In Part IV, the school provides information on FSEOG funds, the 25% nonfederal share, funds transferred from FWS or Perkins into FSEOG, the administrative cost allowance, and other relevant information.

Part V—Federal Work-Study Program Fiscal Operations Report [IG, pg. 25-26]

In Part V, the school provides information on FWS funds, transfers between years and programs, carry-forward and carry-back provisions, Job Location and Development expenses, administrative cost allowance, total amount earned, jobs created, and other relevant information.

■ The school also provides information on expending funds to pay students in community service jobs, and students serving as reading tutors under the "America Reads" program.

Part VI—Program Summary Fiscal Operations Report [IG, pg. 27-28]

Part VI contains two sections.

■ In Section A, a school identifies its campus-based aid recipients by type of student and by income. The school enters the amount spent and number of recipients in each category. Backup documentation must be kept on file at the school.

■ Section B is used to calculate a school's administrative cost allowance (ACA).

Submitting the FISAP

The electronic FISAP must be submitted to ED via the Title IV Wide Area Network. By July of 1998, ED will send to all schools FISAP software and last year's FISAP data. Schools must complete the new FISAP and send it to ED via TIV WAN by October 1, 1998. You'll receive your tentative allocation amounts by February of 1999, and your final allocation amounts by April of 1999.

Note to Instructor:
Information on the new FISAP is in
DCL CB-98-2.

Remember that Part I of the FISAP includes space for required original signatures on the Drug-Free Workplace and Debarment Certifications. These certifications must be printed, signed, and sent in paper form to ED.

Are there any questions about the FISAP?

Now we'll look at a reporting requirement for the Direct Loan and FFEL Programs.

STUDENT STATUS CONFIRMATION REPORT (SSCR)

The National Student Loan Data System (NSLDS) sends a **Student Status Confirmation Report (SSCR)** at least once per term to term-based schools, and at least twice per year to nonterm schools, depending on the schedule set up by the schools. These reports include a list of the students attending the school who have had one or more Direct Loan Program or FFEL Program loans.

Note to Instructor:
Some other rules on scheduling SSCR reports include:
• no reports in consecutive months
• no more than 6 reports/ year
ED suggests reporting every other month.

■ The main purpose of the report is to check enrollment status, for a student must be enrolled at least half time to receive an in-school deferment of a loan.

NSLDS generates and forwards the SSCR Roster File to the school in either magnetic tape or through Title IV Wide Area Network—TIV-WAN—transmission.

Instructor's Notes

The school:

■ receives the SSCR Roster File and imports it into EDExpress;

■ matches the roster file against registration files;

■ updates each student's enrollment status and effective enrollment status date;

■ proposes changes to a student's Social Security number, name, and date of birth as needed;

■ adds a "detail record" to the file for each new student as needed;

■ changes or adds student address data as needed;

■ ensures that all files that have been updated contain valid data; and

■ using EDconnect, returns the updated SSCR Roster File, now called the SSCR Submittal File, to NSLDS within 30 days of the date it is sent to the school.

Remember, both the Direct Loan and FFEL Programs require SSCR reporting.

Note to Instructor:
A detail record in the SSCR Roster File includes three enrollment-related fields:
• date of anticipated completion
• code for enrollment status, and
• date enrollment status becomes effective.

LOAN RECONCILIATION REPORTING

Schools that participate in the Direct Loan Program must reconcile funds with the Direct Loan Servicing Center on a monthly basis. The reconciliation process involves the school checking data ED sends in the form of a Direct Loan School Account Statement. This statement is made up of the cash summary, cash detail, and loan detail. The data are records that affect a school's Direct Loan cash balance, including:

■ drawdowns (cash receipts),

■ return of excess cash,

- disbursements to borrowers,

- disbursement cancellations, and

- adjustments.

Direct Loan schools should track cash transactions and balances using the EDExpress Cash Management function. More details can be found in the *1998-99 Direct Loan Technical Reference.*

Are there any questions about the SSCR or loan-reconciliation reporting?

While the reporting requirements discussed in this session deal with specific Title IV programs, there are other reporting requirements for schools. More information about reporting requirements is found in the Handbook in Chapter Three.

Here's an overview of three of these requirements. (OH 6)

6

Campus Security

This report contains statistics on certain crimes committed on campus over the previous three years, including robbery, sex offenses, and drug and alcohol abuse.

- The report must be distributed to all students and employees by September 1 of each year

Student Right to Know (SRTK)

This report focuses on the graduation, completion, and transfer-out rates of students. One SRTK report must be completed by all schools, while another SRTK report also must be completed by schools with student-athletes receiving student aid.
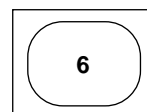
■ These rates are calculated for a class, and the report is due when members of that class should be completing their programs.

■ The report's due date, therefore, is based on the program length of most students in the class.

■ The first class that should be tracked is the one that entered on July 1, 1996.

Equity in Athletics Disclosure Act (EADA)

This report is required of Title IV schools that have intercollegiate athletic programs. The report contains statistics on gender equity in terms of funds spent on sports.

■ The first report was due October 1, 1997. Now, the report is due October 15 each year.

■ The report must be made available to current students, potential students, and the general public. Schools need not submit it to ED unless requested to do so.

This concludes the discussion of reporting requirements. This has been just an introduction to these reports.

	Instructor's Notes
REVIEW QUIZ	
Now that we have completed this session, take a few minutes to answer the review-quiz matching exercise on page 17 of your Workbook. You may use the Handbook as a reference to answer the questions.	***PW 17***

» The matching exercise begins below in the Instructor's Guide. Allow participants 5 minutes to match the names of the reports and systems to the correct descriptions before reviewing the quiz.
Solicit responses from participants.

d   monitors schools' compliance with laws and regulations **(Annual Nonfederal SFA Audit)**

c   reflects a school's FFEL Program or Direct Loan Program student borrower data **(SSCR)**

h   includes documentation of crimes committed at the school **(Campus Security Report)**

e   is submitted once a year by schools that use the IRS/ED Skip-Tracing Service **(Federal Perkins Safeguard Activity Report)**

i   includes salaries of coaches **(EADA)**

a   enables schools to compare their records to ED's records for each Pell Grant recipient **(SPS)**

f   is checked monthly by schools participating in the Direct Loan Program **(DLSAS)**

b   is submitted each award year by schools to report previous expenditures and apply for future funding **(FISAP)**

g   tracks completion rates of students **(Student Right to Know)**

BACK AT THE OFFICE

Once you get back to your office, you should find out if your school needs a DUNS number for GAPS. You should also verify that your school is completing the Campus Security report, the Student Right to Know report, and the EADA report.

What else should you do when you return to your office?

PW 18

Reporting Requirements for Title IV Programs

Required Reports	Federal Pell Grant	Campus-Based (FSEOG, FWS, Federal Perkins)	Federal Family Education Loans	Federal Direct and Federal Direct PLUS Loans
Student Payment Summary (SPS)	✔			
FISAP (due October 1)		✔		
Federal Perkins Safeguard Activity Report (due August 31)		**(Perkins only)**		
Student Status Confirmation Report (SSCR) sent periodically			✔	✔
Loan Reconciliation (monthly DLSAS)				✔
Annual Nonfederal SFA Audits	✔	✔	✔	✔
Campus Security Act Report, Student Right to Know, & Equity in Athletics Disclosure	**Not tied to a specific program**			

Reporting Deadlines for Title IV Programs, 1998-99 Award Year

Program	July 1998	Aug	Sept	Oct	Nov	Dec	Jan 1999	Feb	Mar	Apr	May	June
All programs	Both the financial audit and the program compliance audit are due within 6 months of the end of the institution's or third-party servicer's fiscal. (Exception: Single Audit Act audits; see *The Blue Book* for details)											
Campus-Based (FSEOG, FWS, Federal Perkins Loans)		Perkins Safeguard Activity Report 8/31		FISAP[2]								
Federal Pell Grants			SPS[1]									
Federal Family Education Loans	Student Status Confirmation Reports (SSCRs) received from ED's NSLDS must be returned within 30 days of receipt.											
Federal Direct and Federal Direct PLUS Loans	Student Status Confirmation Reports (SSCRs) received from ED's NSLDS must be returned within 30 days of receipt; *and* DLSAS reports must be checked, and errors must be reported											

[1]Final SPS for award year end 1997-98

[2]The FISAP includes the Perkins Report of Defaulted Loans, due October 1, 1998 to report on 1997-98 expenditures.